IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JAE HWAN HWANG, and YOUNG HWANG

CIVIL DOCKET NO. 2:09-cv-01178-el

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SIEMENS-FURNAS CONTROLS, et al.

SIEMENS ENERGY & AUTOMATION, INC.'S, IMPROPERLY SUED AS SIEMENS-FURNAS CONTROLS AND FURNAS ELECTRIC CO. (HEREINAFTER "ANSWERING DEFENDANT") ANSWER TO CROSS CLAIMS OF AMERICAN MEAT EQUIPMENT CORP. AND AMERICAN EQUIPMENT LLC

Defendants, Siemens Energy & Automation, Inc. improperly sued as Siemens-Furnas Controls and Furnas Electric Co. (hereinafter "answering defendant"), by and through its attorneys WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP, hereby answers these cross-claims as follows:

- 1. The title of the crossclaims "New Matter" is not a proper designation as to crossclaims in federal court and should be stricken. Denied. This paragraph sets forth legal conclusions to which no responsive pleading is required. On the contrary, answering defendants are in not in any way responsible for the alleged injuries and acted free of any carelessness, recklessness, negligence, or other breach at any time.
- 2. Denied. This paragraph sets forth legal conclusions to which no responsive pleading is required. On the contrary, answering defendants are in not in any way responsible for the alleged injuries and American Meat Equipment Corp. and American Equipment LLC are not responsible for indemnity and/or contribution nor are they jointly and severally liable.

WHEREFORE, answering defendant respectfully request that judgment be entered in their favor and against defendants Butcher Boy Limited d/b/a Butcher Boy, and IGB Systems Limited d/b/a Butcher Boy; William Lasar III d/b/a Butcher Boy, and Butcher Boy; Lasar Manufacturing Company,

Inc. d/b/a Butcher Boy; Westglen Corporation d/b/a Butcher Boy; American Meat Equipment Corp. d/b/a Butcher Boy; and American Meat Equipment LLC d/b/a Butcher Boy, and Butcher Boy along with attorney's fees and other costs that the Court deems just and proper.

Respectfully submitted,

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

BY:

Kathleen D! Wilkinson, Esquire

Attorney I.D. No. 34579 Attorney for Defendants

Siemens Energy & Automation, Inc. improperly sued as Siemens-Furnas Controls and Furnas

Electric Co.

CERTIFICATE OF SERVICE

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